

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Eric Mathew Kunjappy, Debtor**

**Case No. 23-02043-JAW  
CHAPTER 13**

**MOTION TO INCUR NEW DEBT**

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 09/05/2023.
2. Debtor is paying approximately 3.04% to General Unsecured Debts through the plan.
3. Debtor plans to attend the University of Southern Mississippi to continue his education to obtain a bachelor's degree in cybersecurity. He intends to enroll in the Fall 2025, Spring 2026, Fall 2026, and Spring 2027 semesters.
4. Debtor is currently employed as an Administrative Support IV employee with the Mississippi Department of Environmental Quality, earning approximately \$41,600 per year. By obtaining a bachelor's degree in cybersecurity, he could potentially increase his annual income to around \$90,000.
5. Debtor seeks to obtain financial aid in the amount of \$7,000.00 at an interest rate of 4.2 percent, to be disbursed in approximately \$1,750.00 increments per semester to complete his cybersecurity degree.
6. Debtor will repay this debt directly to the lender in accordance with the terms of their agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MS Bar No. 103469)  
The Rollins Law Firm, PLLC  
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Incur New Debt was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.